

1           Q     Page eight of Exhibit Number 70. There is no  
2 date on those entries. Can you tell what date those were  
3 made?

4           A     On page eight?

5           Q     Yes, ma'am.

6           A     They were the same as the ones the day before,  
7 6/19.

8           Q     So you wrote, on 6/19 you wrote one, two, three,  
9 four, five, six, seven, eight, nine -- nine checks that day,  
10 is that right?

11          A     That's correct.

12          Q     And two of those were for the church.

13          A     Yes.

14          Q     You did not write any checks down in Junction?

15          A     No.

16          Q     Page 11 of Exhibit Number 70. In June of 1996,  
17 was Melissa living at home?

18          A     Nineteen-ninety-six?

19          Q     Yes, ma'am.

20          A     June, yes.

21          Q     She was home from school that summer?

22          A     Yes.

23          Q     Where was she working, do you remember?

24          A     In 1996 she was working for a man taking care of  
25 his children.

1 Q Was she able to work on weekends?

2 A No.

3 Q Did she go down on the trip with you all to visit  
4 your aunt?

5 A No.

6 Q So she was still at home?

7 A Yes.

8 Q Line seven there that you were asked about on  
9 this long distance phone bill on page 11, there is nothing  
10 on that to indicate that that is a call to your aunt to tell  
11 her that you are on your way, is there?

12 A Well, it's the time of the day it's made. We  
13 probably called her and told her we were coming. And that's  
14 her number.

15 Q But there is nothing on this record that a third  
16 party could look at to say yes, that is a call they made to  
17 their aunt to tell her they are on the way.

18 A I don't know how it could be on the telephone.

19 Q You made that call from your office?

20 A Uh, yes.

21 Q Well, you were not on your way at 8:57, were you?

22 A No.

23 Q You still went over to Dickie's to get some  
24 barbecue?

25 A Yes, at noon.

1 Q And that is just for two people, that barbecue  
2 meal, right?

3 A Yes.

4 Q How long did it take to get down to Aunt  
5 Estelle's house that day?

6 A Oh, five, six hours.

7 Q Which way did you go?

8 A Well, we go out -- I don't know. We go out 635,  
9 in the Midlothian.

10 Q Down through, down on 35? Or 67?

11 A I don't know. It's 35 I'm sure.

12 Q Well, do you go through Midlothian, or do you go  
13 through Corsicana?

14 A Midlothian.

15 Q Or, excuse me, Waxahachie.

16 A Midlothian.

17 Q You go through Stephenville?

18 A I don't know. Jim drives. Jim drives, I keep  
19 him awake. I drive part of the time, but I don't -- I just  
20 go by, I don't know directions, I just go from town to town.

21 Q Well, do you know if you go through Cleaver?

22 A Yes.

23 Q You do go through Cleburne. So you go down 67?

24 A We've been down that way before. We go more than  
25 one way.

1 Q Pardon?

2 A We go more than one way.

3 Q Do you remember which way you went that day?

4 A I'm sure it was out through, probably about  
5 through Cleburne.

6 Q Do you know which road you take down once you get  
7 past Cleburne?

8 A No.

9 MS. LANCASTER: Excuse me, Your Honor. I am not  
10 understanding the words that they are saying. Could you --

11 MR. ROMNEY: Cleburn, C-L-E-B-U-R-N-E.

12 MR. McVEIGH: Cleburne, it is a town.

13 MS. LANCASTER: Okay, thank you. Sometimes it  
14 sounds like Cleburne, and sometimes it sounds like  
15 Cleveland, and I could not figure that out.

16 MR. ROMNEY: Well, there is a Cleveland, Texas, I  
17 believe, but that is not what we are talking about.

18 MS. LANCASTER: Okay.

19 MR. ROMNEY: Texas has every name for every city.

20 MS. LANCASTER: Like Paris.

21 MR. ROMNEY: Paris, Italy, you name it.

22 THE WITNESS: There's also a London.

23 MR. ROMNEY: Rome.

24 THE WITNESS: I go through London.

25 BY MR. ROMNEY:

1           Q     Okay. Are you able to tell on this particular  
2 Exhibit Number 12, page 12 or 13 of Exhibit 70, what time  
3 gasoline was purchased at the Texaco in Junction?

4           A     No. Just the date. That would probably have  
5 been in the morning. We always had to gas up before we'd  
6 leave.

7           Q     The last page, 14, of Exhibit Number 70. That is  
8 from your house, is that right?

9           A     Yes.

10          Q     Did you all stop down to visit Jim's mother in  
11 Temple on the way down for this trip, on the 21st, 22nd?

12          A     I don't believe we did.

13          Q     You recall testifying in your deposition, do you  
14 not, ma'am, that around that summer of 1996, that you went  
15 to your sister Patsy's house most every weekend, right?

16          A     That's correct.

17          Q     And that was true?

18          A     That was true.

19          Q     And it still is today true?

20          A     Still is today. At that time.

21          Q     You do not deny that there have been times when  
22 you and your two daughters stopped off to see, or to pick up  
23 Aunt Patsy at her house to go shopping on a Saturday?

24          A     If my daughters went, it was very seldom.

25          Q     My question is, you do not deny that that has

1 happened, do you?

2 A No, I don't deny it.

3 Q Exhibit Number 46, please, ma'am. Do you see  
4 that, ma'am?

5 A Yes.

6 Q Did you receive a copy of this 800-A in the mail?

7 A I don't know.

8 Q You do recall receiving a copy of the Net Wave  
9 petition, Exhibit Number 1, in the mail at home, correct?

10 A That's correct.

11 Q Even though it was mailed to the wrong address?

12 A Yes.

13 Q Did you recall receiving the Net Wave petition  
14 before you saw it the first time? Exhibit Number 46?

15 A I received the Net Wave petition before, I think  
16 before I saw this. I know I did.

17 Q Did you ever have any discussions with Ronald  
18 about what would be done in response to that Net Wave  
19 petition?

20 A No.

21 Q Did you understand Jim to be having discussions  
22 with Ronald about what would be done?

23 A Jim was talking with Ronald.

24 Q And you were just out of that process?

25 A I was out of that process.

1 Q So you did not, it did not concern you one way or  
2 the other who or what was going to be done on your behalf on  
3 the Net Wave petition, because Jim was handling it, right?

4 A Jim was handling it.

5 Q And that was not really your concern, was it?

6 A Well, it was my concern, but I wasn't handling  
7 it. He was.

8 Q And if Jim had led Ronald to believe that Jim had  
9 no problem with Ronald's attorneys filing an opposition on  
10 his behalf, on Jim's behalf, you do not know about that one  
11 way or the other because you were not immediately concerned.

12 A No.

13 MS. LANCASTER: Objection, Your Honor.

14 JUDGE STEINBERG: Overruled. It would have been  
15 overruled anyway.

16 MR. ROMNEY: Did we get an answer on the record?

17 JUDGE STEINBERG: The answer to the question was  
18 no. Is that what the answer was?

19 THE WITNESS: That was correct. No.

20 JUDGE STEINBERG: If you would like to ask it  
21 again.

22 BY MR. ROMNEY:

23 Q If Jim --

24 JUDGE STEINBERG: Jim led Ronald to believe.

25 MR. ROMNEY: Yes, sir, thank you.

1 BY MR. ROMNEY:

2 Q If Jim led Ronald to believe that Jim was okay  
3 with Ronald's attorneys filing an opposition on behalf of  
4 yourself and Jim, that is not something that you would have  
5 known about at the time anyway, would you?

6 A No.

7 Q Because you had taken yourself out of those  
8 day-to-day transactions, correct?

9 A That's correct.

10 Q And so in every true sense, ma'am, you do not  
11 know whether or not Ronald's attorneys were authorized to  
12 file an opposition on behalf of yourself, or not, do you?

13 MR. McVEIGH: Objection. Calls for the witness  
14 to make a legal conclusion.

15 JUDGE STEINBERG: Overruled. Your answer is not  
16 a legal conclusion. Your answer is what you think in your  
17 head.

18 Do you want to say it again?

19 BY MR. ROMNEY:

20 Q You do not know whether Ronald's attorneys were  
21 authorized to file an opposition on your behalf to the Net  
22 Wave petition or not, do you?

23 MS. LANCASTER: Your Honor, I am going to object.  
24 She has already indicated she did not authorize it. And she  
25 would be the only one who had the authority to authorize it.

1 MR. ROMNEY: Thank you, Your Honor.

2 JUDGE STEINBERG: Okay, why don't you try again?

3 MR. ROMNEY: That is the whole purpose of  
4 cross-examination, if I could be so bold as to say that.

5 MS. LANCASTER: Well, let's go on.

6 MR. ROMNEY: Well, yes, but without those kind of  
7 interjections to the witness. Because this witness has now  
8 established that she was not paying attention to what was  
9 going on. And so for her to say that she did not authorize  
10 anybody is perhaps misleading to this Court.

11 JUDGE STEINBERG: I do not have any problem -- I  
12 overruled the objection.

13 MR. ROMNEY: Okay. I am sorry.

14 JUDGE STEINBERG: Didn't you hear that?

15 MR. ROMNEY: I did not hear a ruling on the  
16 objection.

17 JUDGE STEINBERG: Didn't I overrule it?

18 MS. LANCASTER: No, sir, I do not believe you --

19 MR. McVEIGH: The first time --

20 MS. LANCASTER: The first time you did, but I do  
21 not believe you overruled the second one.

22 JUDGE STEINBERG: Okay, ask it again. It is  
23 overruled before you state it.

24 (Laughter.)

25 JUDGE STEINBERG: I owe you one, Mr. Romney.

1 MS. LANCASTER: Do I get credit for all the ones  
2 you owe me, too, Your Honor?

3 JUDGE STEINBERG: You have been getting credit  
4 the whole two weeks.

5 (Laughter.)

6 JUDGE STEINBERG: Okay, the last comment, let the  
7 record reflect jest.

8 Please ask your question again.

9 MR. ROMNEY: Thank you.

10 JUDGE STEINBERG: And if you can do it by staying  
11 away from the word "authorized," that may be a source of a  
12 problem.

13 MR. ROMNEY: Well, that is the word that she  
14 used, and that is the word she was asking about. And that  
15 appears to be the operative accusation against Mr. Brasher's  
16 attorneys.

17 JUDGE STEINBERG: Okay, then, use whichever word  
18 you prefer.

19 MR. ROMNEY: Thank you, Your Honor.

20 BY MR. ROMNEY:

21 Q Mrs. Sumpter, you have no personal knowledge  
22 whether your husband, Jim Sumpter --

23 JUDGE STEINBERG: Use it.

24 BY MR. ROMNEY:

25 Q Mrs. Sumpter, you have no personal knowledge

1 whether your husband, Jim Sumpter, authorized Ronald  
2 Brasher's attorneys to file an opposition on your behalf to  
3 the Net Wave petition, do you?

4 A No.

5 Q And you authorized, as you may understand that  
6 word to be without it being a legal conclusion, ma'am, you  
7 authorized your husband to handle any response to the FCC in  
8 that time frame, late 1997, is that correct?

9 A I authorized my husband?

10 Q Yes, ma'am.

11 A To the FCC?

12 Q You authorized your husband to act on your behalf  
13 to handle the Net Wave petition.

14 A Yes.

15 (Pause.)

16 MR. ROMNEY: Excuse me, Your Honor.

17 JUDGE STEINBERG: We can go off the record, and  
18 then you can take your time looking for your next area.

19 (Whereupon, a brief recess was taken.)

20 JUDGE STEINBERG: Back on the record.

21 MR. ROMNEY: Your Honor, in light of some of the  
22 testimony that has been adduced so far by this witness, I  
23 have made a request for Mr. McVeigh to have a chance to  
24 review the remainder of that date book.

25 JUDGE STEINBERG: Yes, sir.

1           MR. ROMNEY: And apparently it is not in the  
2 record at this point, but I would certainly request an  
3 opportunity to take a look at it.

4           JUDGE STEINBERG: Any objections?

5           MR. McVEIGH: It is Mr. Sumpter's private date  
6 book, and I certainly cannot consent to allowing him to  
7 rummage through the entire book. We have all put specific  
8 pages in the record.

9           If there is a question as to the genuineness of  
10 the copies, he is certainly free to look at those pages in  
11 the original. But the rest of it is not in the record; I  
12 see no reason for it to be rummaged through.

13          JUDGE STEINBERG: Well, would there be something  
14 specific you would be looking for that perhaps Mr. McVeigh  
15 could help you find?

16          MR. ROMNEY: Well, my request, if you will notice  
17 on page 70, Exhibit 70, page six, there is an entry that  
18 says "Pat and Ron Brasher, PU."

19          JUDGE STEINBERG: I have to admit that I did  
20 notice that.

21          MR. ROMNEY: Yes, so did I. I want to find out  
22 what other notations are in the book for the year about Ron  
23 and Pat Brasher.

24          JUDGE STEINBERG: Okay, I think that is a  
25 reasonable request. But I would like you to review the book

1 with

2 Mr. McVeigh sitting next to you.

3 MR. ROMNEY: I have no problem with that.

4 MR. McVEIGH: Do you have any problem with that,  
5 Mr. McVeigh? And that I would expect that any other entries  
6 in that book that you might notice that do not pertain to  
7 Ron and Pat, that you will keep confidential.

8 MR. ROMNEY: I have no problem with that.

9 JUDGE STEINBERG: And even confidential from your  
10 client.

11 MR. ROMNEY: Certainly.

12 JUDGE STEINBERG: And the same goes for Mr.  
13 Pedigo. Did you have any objection to that? And the  
14 Bureau, of course.

15 MR. McVEIGH: I will do it, under protest, if you  
16 direct me to, Your Honor.

17 JUDGE STEINBERG: Okay. You are directed to.

18 MR. ROMNEY: so basically, at this point, the  
19 attorneys' eyes only.

20 JUDGE STEINBERG: Yes, sir. And except for  
21 entries relating to the Brashers, you have to keep  
22 everything else confidential.

23 MR. ROMNEY: Is this something we can be  
24 accomplishing while questions are being undertaken?

25 JUDGE STEINBERG: It is entirely up to you.

1 MR. ROMNEY: Well, that is certainly my  
2 preference, rather than delay the testimony.

3 JUDGE STEINBERG: I mean, we have got --

4 MR. ROMNEY: If Mr. McVeigh does not have any  
5 objections.

6 JUDGE STEINBERG: Although Mr. McVeigh is  
7 concentrating on --

8 MR. ROMNEY: I understand.

9 MR. McVEIGH: Perhaps we should take a break and  
10 let them go through it.

11 JUDGE STEINBERG: You want to do that? That is  
12 fine.

13 MR. ROMNEY: That is fine. I would just like to  
14 know. I mean, I --

15 JUDGE STEINBERG: Yes, okay.

16 MR. ROMNEY: I can have my associate sit there  
17 and look at it while I ask the questions.

18 JUDGE STEINBERG: We will do it now. I cannot,  
19 you know, it is only 52 pages, double pages.

20 MR. ROMNEY: Okay.

21 JUDGE STEINBERG: And there do not seem to be  
22 very many entries on each page that I have seen. So I think  
23 it is a reasonable request.

24 Let's go off the record while we do that.

25 (Whereupon, a brief recess was taken.)

1 JUDGE STEINBERG: Back on the record. Ms.  
2 Lancaster?

3 MS. LANCASTER: Your Honor, as far as we are  
4 concerned, this is a belated discovery request. They did  
5 not ask for any of these documents previously. And if it  
6 does not go to the genuineness of the document, then it is  
7 untimely.

8 JUDGE STEINBERG: I think I used an axiom of --  
9 well, I am not going to use the word. But I think I was  
10 very generous in my ruling receiving the documents into  
11 evidence. And I think that the request is reasonable, that  
12 they are making.

13 So the objection is overruled, given the  
14 parameters that I placed upon the inspection. So let's go  
15 off the record and do that.

16 (Whereupon, a brief recess was taken.)

17 JUDGE STEINBERG: We are back on the record. Is  
18 your review completed, Mr. Romney?

19 MR. ROMNEY: Our review is completed. I would  
20 ask that the witness have an opportunity to answer just a  
21 few questions about some of those entries?

22 JUDGE STEINBERG: Yes, sir.

23 BY MR. ROMNEY:

24 Q Mrs. Sumpter, I would ask you to turn to April 2,  
25 1996, in the Daytimer for your husband for that year,

1 please.

2 A Yes.

3 Q The 10 o'clock entry in the morning, 10 a.m.

4 A Yes.

5 Q Does that say Brasher or does that say Brashel?

6 A Brasher.

7 Q Is that for these Brashers, Ron and Pat?

8 A Yes.

9 Q What does that indicate?

10 A They had an appointment.

11 Q And does it say how long they had an appointment

12 for?

13 A Well, no. He usually has an hour, hour and a

14 half between appointments during tax season.

15 JUDGE STEINBERG: "He" being your husband?

16 THE WITNESS: My husband.

17 BY MR. ROMNEY:

18 Q Jim? I will ask you to turn --

19 MR. ROMNEY: Sorry, is there something else of

20 note?

21 JUDGE STEINBERG: No, I was just looking.

22 MR. ROMNEY: Okay.

23 BY MR. ROMNEY:

24 Q Ma'am, without -- my review of the record of that

25 document that you have in front of you right now indicated

1 no other notations relating to either DLB or Brashers from  
2 January 1 of 1996 until that April 2, 1996. Now, you can  
3 either take my word for it, or you can go back through the  
4 record yourself, though I believe your attorney was there  
5 with us when we looked at it.

6 Will you confirm for the Court, please, that  
7 there are no other entries in your appointment book for the  
8 Brashers or for DLB from January 1, 1996 up until April 2,  
9 1996?

10 (Witness examines document.)

11 A That is correct.

12 Q I would ask you next to go ahead and spin through  
13 those pages up until 6/25/96 at 3 p.m., and see if you see  
14 any other entries regarding Pat, Ron, or DLB.

15 (Witness examines document.)

16 A That is correct.

17 Q Have you satisfied yourself, ma'am, that there  
18 are no other entries for Ron or Pat or for DLB --

19 A Yes.

20 Q -- up until 6/25/96 at 3 p.m.?

21 A Yes.

22 Q And that entry reads "Pat and Ron, PU," is that  
23 correct?

24 A Yes.

25 Q And what does that signify?

1           A     That they had an appointment to pick up their  
2     bookkeeping.

3           Q     And then the next entry that we were able to find  
4     that had anything to do with DLB was August 12, 1996 at  
5     2 p.m. It said, "DLB," it looks like "IMS audit."

6           A     August 12?

7           Q     August 12, yes, ma'am.

8           A     Yes.

9           Q     Have you satisfied yourself that there are no  
10    other entries between June 25, 1996 at 3 p.m. and August 12,  
11    1996 at 2 p.m., for either Ronald or Pat Brasher or for DLB?

12          A     Yes.

13          Q     Then the next entry that we were able to locate  
14    was on November 6, 1996 at 3 p.m., an entry that says "DLB  
15    Pat."

16                MS. LANCASTER: What was that date again, please?

17                MR. ROMNEY: Eight/12 -- which one?

18                MS. LANCASTER: The last one.

19                MR. ROMNEY: Eleven/6/96.

20                (Pause.)

21                THE WITNESS: Okay, yes.

22                BY MR. ROMNEY:

23          Q     Have you satisfied yourself, ma'am, that the next  
24    entry pertaining to Pat or Ron Brasher or DLB is November 6,  
25    1996 at 3?

1 A Yes.

2 Q Are you able to determine, ma'am, from that entry  
3 on November 6 of '96 what sort of an appointment that was?

4 A No.

5 Q The next entry that we were able to find was  
6 12/19/96 at 5:15.

7 A On 12 --

8 Q Twelve/19/96.

9 A Twelve/19?

10 Q At 5:15 in the afternoon.

11 A Probably at that time of the year it would  
12 probably be their bookkeeping.

13 Q Have you satisfied yourself, ma'am, that there  
14 are no other entries pertaining to Ron or Pat Brasher or for  
15 DLB between November 6, '96 and 12/19/96 in that book?

16 A Yes.

17 Q And then the next entry appears to be on 12/20/96  
18 at 11, where it says "lunch DLB."

19 A Yes.

20 Q And we were not able to find any other entries  
21 pertaining to Ronald or Pat Brasher or DLB, is that correct?

22 A That's correct.

23 Q And I will point out, ma'am, that there were no  
24 entries for David or Diane Brasher in that book.

25 A No.

1 Q Is that correct?

2 A That's correct.

3 Q Now, Ronald or Pat Brasher picked up work at your  
4 husband's accounting firm more often than is indicated in  
5 that particular Daytimer, is that correct?

6 A Yes. They picked it up once a month.

7 Q And Ronald or Pat Brasher brought information  
8 over to your office at times that were not necessarily  
9 reflected in that book, correct? During 1996?

10 A Pat brought it, but it wouldn't necessarily be in  
11 there. Because they'd just hand it to me.

12 Q They would come in to the office and give you  
13 information.

14 A They would hand me the information.

15 Q Okay. And that is not reflected in your book.

16 A No.

17 Q Ma'am, I will ask you to turn to Exhibit 37, page  
18 14.

19 A Fourteen?

20 Q Yes, ma'am. You did get a copy of this, did you  
21 not?

22 A Yes.

23 Q And this was the fax that was sent over to your  
24 husband's accounting firm on November 23, 1997, from  
25 Metroplex Two-Way?

1 MS. LANCASTER: You said 14?

2 MR. ROMNEY: Page 14.

3 MS. LANCASTER: Oh, page 14.

4 MR. ROMNEY: Exhibit 37, page 14.

5 MS. LANCASTER: Okay, sorry. I thought you said  
6 Exhibit 14.

7 BY MR. ROMNEY:

8 Q You did receive a copy of that document, ma'am?

9 A Yes.

10 Q And it had attached to it all the way through  
11 page 19 of Exhibit 37? The fax?

12 A Yes.

13 Q And you read this document at that time?

14 A No, I wouldn't have read it as soon as I took it  
15 off the fax machine.

16 Q You did read it?

17 A No, not when I took it off the fax machine.

18 Q But you did have an opportunity to read that some  
19 time within a day or so of November 23, 1997?

20 A Yes.

21 Q And did you ever say anything to Ronald Brasher  
22 about that document?

23 A I don't remember.

24 Q You do not remember one way or the other?

25 A I don't remember saying anything to him. I don't

1 know.

2 JUDGE STEINBERG: Is it fair to say you might  
3 have, but you do not remember it today?

4 THE WITNESS: I might have, I just don't remember  
5 it today.

6 BY MR. ROMNEY:

7 Q Nobody prevented you from talking to Ron Brasher  
8 about this document?

9 A No.

10 Q Nobody prevented you from asking a question to  
11 Ron Brasher who the heck is Curt Brown on page 14 of that  
12 exhibit?

13 A No, no one prevented me from that.

14 Q You had every opportunity to do whatever you  
15 wanted to with this document, correct?

16 A I did.

17 Q I ask you to turn to page, page 18, if you would  
18 refer to that, of that Exhibit 37. You received that  
19 particular page, correct?

20 A Yes.

21 Q And it had a phone number of this law firm in  
22 Washington, D.C., did it?

23 A Yes.

24 Q Did anybody prevent you from calling up that  
25 number?

1 A No.

2 Q And your name was listed up on top of that above  
3 the signature line?

4 A Yes.

5 Q I ask you to turn to Exhibit 47, please. Now,  
6 you had already seen that draft of the opposition you were  
7 just looking at, before this Exhibit Number 47 was written,  
8 correct?

9 A Yes.

10 Q I ask you to turn to Exhibit 39, please. Do you  
11 recognize that as your husband's version of that letter that  
12 you sent to Ron and Pat Brasher --

13 A Yes.

14 Q -- which was Exhibit 47?

15 A Yes.

16 Q Were they all sent in the same envelope, ma'am?

17 A I believe they were.

18 Q Would you turn to the second page, please, of  
19 Exhibit Number 39? Is that a copy of the envelope?

20 A I don't know. I assume it is.

21 Q Well, the reason I ask you, ma'am, the first page  
22 of Exhibit 39 was dated November 29. Do you see that?

23 A Yes.

24 Q Of '97?

25 A Yes.

1 Q And the postmark on the second page of Exhibit  
2 Number 39 is December 10 of '97, do you see that?

3 A I can't tell if it's December 10 or not.

4 JUDGE STEINBERG: Look on the postage meter.

5 THE WITNESS: Oh, okay. Yes.

6 BY MR. ROMNEY:

7 Q And is that the -- I mean, you handled the mail  
8 at your office, did you not? At Sumpter Accounting in 1997?

9 A Yes.

10 Q And this would have been a document that you  
11 would have prepared?

12 A Yes.

13 Q And you would have prepared the certified  
14 mailing?

15 A Yes.

16 Q And you would have run it through a postage  
17 meter?

18 A No.

19 Q Is this from the post office?

20 A It's from the post office.

21 Q Okay. You took it down to the post office to  
22 send it?

23 A Yes.

24 Q Can you explain to the Court why there was a  
25 delay from November 29, the day of the letter, to

1 December 10, the mailing of the letter?

2 A No.

3 Q What were you doing between November 29 and  
4 December 10?

5 A I wasn't doing anything.

6 Q What was Jim doing?

7 A I don't know. I can't tell you why there was a  
8 delay.

9 Q I am sorry?

10 A I said I can't tell you why there was the delay.

11 Q In fact, you got this letter back, did you not,  
12 from the post office?

13 A I don't know if we did or not.

14 Q Well, it says down there on the stamp portion,  
15 "first notice," "second notice," and then "returned," 12/26?

16 A Well, I assume it did.

17 Q Did you resend it?

18 A I don't know. I don't know.

19 Q You received a response from Ron Brasher,  
20 correct? To that letter, Exhibit Number 39? Do you recall  
21 receiving a response from Mr. Brasher?

22 A I don't recall.

23 Q I am sorry, ma'am, I will find it for you real  
24 quick. While we are looking for that response, your desire  
25 to Mr. Brasher, once you found out about the Net Wave

1 petition, your desire was to get those licenses transferred  
2 out of your name, correct?

3 A That's correct.

4 Q Mr. Brasher told you that he would do that?

5 A Yes, he did.

6 Q Did he tell you the documents that you would have  
7 to sign and file to do that?

8 A No.

9 Q Did he tell you you had to file an 800-A, a  
10 construct letter?

11 A Well, he brought it over there and told me I had  
12 to sign it first.

13 Q And he told you that was part of the process to  
14 get it transferred, the license, out of your name?

15 A He told me that was a transfer when he brought it  
16 over.

17 Q And he brought that letter over, if you will turn  
18 to Exhibit 46. Do you have that?

19 A Yes.

20 Q He brought that over, and you signed it on or  
21 about December 16, 1997?

22 A Yes.

23 Q And did you understand that this was going to be  
24 the complete transfer?

25 A That's what he told me.

1           Q     You understood immediately thereafter, at your  
2 office, when your husband said, "Wait a second, this is not  
3 a transfer," you understood that was not the whole thing,  
4 right?

5           A     No, I didn't understand that wasn't the whole  
6 thing.

7           Q     Well, when Jim raised the question to Ron, after  
8 they discussed it in your presence, you understood that  
9 there were other documents that had to be filed to transfer,  
10 did you not?

11          A     No. Well, I understood that, yes, that this  
12 wasn't a transfer.

13          Q     And is it not true that Ron told you that there  
14 needed to be another document filed for transfer?

15          A     I don't remember him telling me that.

16          Q     Well, you knew by the time --

17          A     He told me this one had to be signed before it  
18 could be transferred.

19          Q     So you understood that this was a step in having  
20 it transferred, this Exhibit Number 46.

21          A     That's what he explained to my husband.

22          Q     Okay. And then, on Exhibit 20, page 19, you  
23 understood that was the transfer?

24          A     Yes.

25          Q     And you understood that when you signed it on